

LAWRENCE A. ORGAN (SBN 175503)  
NAVRUZ AVLONI (SBN 279556)  
CIMONE A. NUNLEY (SBN 362915)  
**CALIFORNIA CIVIL RIGHTS LAW GROUP**  
332 San Anselmo Ave.  
San Anselmo, California, 94960  
Telephone: (415) 453-4740  
Facsimile: (415) 785-7352  
larry@civilrightsca.com  
navruz@civilrightsca.com

J. BERNARD ALEXANDER (SBN 128307)  
**ALEXANDER KRAKOW + GLICK LLP**  
1900 Avenue of the Stars, Suite 900  
Los Angeles, California 90067  
Telephone: (310) 394-0888  
Facsimile: (310) 394-0811  
balexander@akgllp.com

Attorneys for Plaintiffs  
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL IN SUPPORT OF  
PLAINTIFFS' REPLY IN SUPPORT OF  
THEIR MOTION FOR SANCTIONS  
PURSUANT TO FRCP 37(B)(2)(A)**

Date: February 19, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: May 11, 2020

Complaint filed: October 16, 2017

**MOTION**

Pursuant to Local Rules 7-11 and 79-5, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz respectfully request an order sealing the physical copies in the Court's files of Exhibit A to the Supplemental Declaration of Cimone Nunley in Support of Plaintiffs' Administrative Motion to File Under Seal. This Motion is based on the Supplemental Declaration of Cimone Nunley in support thereof, and the documents to be sealed are laid out below:

Document	Designating Party	Basis for Sealing
Exhibit A: Deposition of Edward Romero	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Publicizing this document would violate the Protective Order entered in this case [Dkt. No. 50].

DATED: February 3, 2020

By:



Lawrence A. Organ, Esq.

Navruz Avloni, Esq.

J. Bernard Alexander, Esq.

Cimone A. Nunley, Esq.

Attorneys for Plaintiffs

DEMETRIC DI-AZ AND OWEN DIAZ